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By Facsimile Transmittal (212) 805-7948

Honorable Richard J. Holwell United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re:

Tran Dinh Truong, individually and on behalf of Alphonse Hotel Corp. d/b/a Hotel Carter v. New York Hotel & Motel Trades Council, AFL-CIO, ("Union") The Office of the Impartial Chairman ("OIC") and Peter Ward ("Ward") Case No. 1:07-Civ-11383 (RJH)

Dear Judge Holwell:

I am writing this letter in reply to Mr. Saltzman's letter dated May 12, 2008, wherein he opposes my request for an extension of the deadline for Plaintiff to serve and file opposition to the Union's and OIC's motions for sanctions.

Although I agreed to file and serve opposition to the Union's motion for sanctions by May 15, 2008, such agreement was made with the understanding that only the Union's motion for sanctions was served. Contrary to the OIC's Certification of Service dated April 8, 2008, my office was only served with the "Declaration of Joel M. Silverstein in Support of OIC's Motion for Sanctions Pursuant Fed.R.Civ.P. 11." As my office is a small firm, and as I am presently required to oppose a total of four motions, I respectfully submit that an extension is warranted. Moreover, there is no prejudice to the Union or OIC as the sanctions motions will be held in abeyance pending the Court's determination on the motions for judgment on the pleadings.

Notably, the Scheduling Order regarding the motions for judgment on the pleadings did not contemplate the Union's and OIC's motions for sanctions.